

October 02, 2020

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1 - ADAM LIEF -

2 IN THE UNITED STATES DISTRICT COURT.
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 ----- X
5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC

11 Defendant.

12 ----- X

13 DATE: October 2, 2020

14 TIME: 11:37 A.M.

15 VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16 OF ADAM LIEF, held via Zoom, pursuant to Notice,
17 before Hope Menaker, a Shorthand Reporter and
18 Notary Public of the State of New York.

19 (Confidential portion appears on pages 135-137)

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2 your role?

3 A. No.

4 Q. Is your position presently within
5 Google Cloud?

6 A. No.

7 Q. At the time your role was moved
8 from -- was it from Google Cloud to Google Tech
9 Infrastructure, is that the move that was made?

10 A. It -- it --

11 Q. Sorry. At the time your role moved
12 from cloud to core systems, did the role itself
13 change in any way?

14 A. No.

15 Q. The systems and applications with
16 which you're involved in your role, are those
17 internal or external?

18 A. Internal.

19 Q. And are those cloud based or on-prem
20 based?

21 A. They are both.

22 Q. Now, I think we discussed before that
23 the systems you worked with at Oracle were on-prem
24 based. Was this your first experience working
25 with applications that were cloud based at Google?

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Q. And this is as of November 11, 2018.

As of November 11, 2018 is there anyone who you recognize as having been in the application engineer director position who is not reflected on this list?

A. No.

Q. Okay. Anil Nagalla, man or woman?

A. Man.

Q. Paras Jain, man or woman?

A. Man.

Q. Okay, and then we can turn again to

Page 19.

A. Okay, I'm here.

Q. Entry 646 has Srivats Ramaswami, is that a man or a woman?

A. That's a man.

Q. As of November 4, 2019 was the application engineer ladder no longer within Google Cloud?

A. That's not correct.

Q. Okay. As of November 4th, 2019 was the application engineer role still within Google Cloud?

A. It was still within Google

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2 Cloud -- it did still exist in Google Cloud, yes.

3 Q. Were you within Google Cloud in
4 November of 2019?

5 A. No.

6 Q. Was Mr. Ramaswami the only
7 application engineer within Google Cloud in
8 November of 2019?

9 MR. GAGE: Objection.

10 A. To my knowledge, the only
11 director-level application engineer in cloud.

12 Q. And as of November 4, 2019, where
13 were the other application engineers sitting
14 within the organizational structure?

15 A. So they were moved to core.

16 Q. And presently are there any
17 application engineers within Google Cloud?

18 MR. GAGE: Objection.

19 A. Cara, I'm sorry, you broke up a
20 little bit. Could you repeat that, please?

21 Q. Sure. Presently, as of the present,
22 are there any application engineer directors
23 within Google Cloud?

24 A. Yes.

25 Q. Who?

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2 A. Srivats for one, the person who is on
3 646.

4 Q. And is Srivats in New York or
5 somewhere else?

6 A. He is in the Bay area.

7 Q. What about Mr. Nagalla, where is he
8 physically located?

9 A. He is in Texas.

10 Q. And Mr. Jain, where is he physically
11 located?

12 A. He's in the Bay area.

13 Q. And the job code listed next to Level
14 8, 3948, do you recognize that job code?

15 A. I -- I don't. I don't recognize the
16 number.

17 Q. Okay, you can put that document
18 aside.

19 Are you familiar with the term
20 "individual contributor" as that term is used at
21 Google?

22 A. Yes, I am.

23 Q. And what do you understand that term
24 to mean?

25 A. I understand that it's someone who

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common responsibility for application engineers at the director level?

A. It is -- it is a common expectation, but I -- because I don't know those roles very specifically, I can't comment on what exactly the responsibilities were, but the expectation is correct.

Q. What other job responsibilities is common across the application engineer director role?

A. So the common expectations for the role would be a focus on support, deployment, implementation of internal systems for Google, managing large programs, and interacting with stakeholders and partners.

MS. GREENE: And, Ms. Menaker, if you could be so kind to read back that response.

(The answer requested was read back by the reporter.)

Q. And when you say support of internal systems, can you tell me what you mean by that?

A. I mean maintenance tasks necessary to keep those internal systems running.

Q. And when you say deployment of

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intern -- of internal systems, what do you mean by that?

A. Deployment could include development, design, testing, and actual releasing of systems and enhancements.

Q. And when you say -- and when you say "systems," you're referring to technology systems; is that correct?

A. Yes, that's correct.

Q. And when you refer to the implementation of internal systems, what do you refer to there?

A. There's a lot of overlap with deployment, but it may also involve third-party system implementation as well.

Q. When you refer to "managing large programs," what do you mean by that?

A. A highly-impactful initiative that will introduce a lot of change into the environment.

Q. Can you give me some examples?

A. Sure. We have a finance transformation program that is replacing much of Google's core finance processes and systems. That

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2 MR. GAGE: Do you have the document
3 handy so we could take a look at it? Which
4 exhibit?

5 MS. GREENE: Give me one moment.

6 I believe 25, Exhibit 25 in
7 the -- it's marked as Exhibit 6 for this
8 deposition.

9 A. Yes. Thank you for that, Cara. It's
10 not.

11 Q. With respect to engineering
12 management for the application engineer director
13 role, what percentage of the job would you say
14 relates to engineering management?

15 A. To clarify, you mean as opposed to
16 the other elements I stated like stakeholders and
17 things like that?

18 Q. Right. So I think you -- you had
19 said that the day-to-day kind of role of the job
20 involved a combination of engineering management,
21 planning, and strategy.

22 A. And stakeholding management -- yeah,
23 got it. I -- personal for engineering management,
24 let me think just a moment.

25 Probably 40 percent.

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2 purchased software product from another company.

3 Q. And what do you mean by "domain"?

4 A. Domain refers to a part of the
5 business operations such as HR, finance,
6 marketing, legal.

7 Q. Anything else?

8 A. The -- maybe the other aspect is
9 about integration. Because we have both
10 first-party and third-party systems, integration
11 between the two becomes a very important skill set
12 for application engineer.

13 There's one other criteria also that
14 is important is that we are heavily internally
15 focused. So our products and our development is
16 for Google's internal use, not for selling to
17 customers or external use in any way.

18 Q. Okay. Is that it?

19 A. That's it.

20 Q. You've been a Level 8 director for
21 how many years?

22 A. About three-and-a half-years I
23 believe, since 2017.